

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Holland Post Office
Holland, Iowa

Docket No. A2012-66

PUBLIC REPRESENTATIVE COMMENTS
(January 24, 2012)

On November 14, 2011, Gary Stoehr, Jr. (Petitioner) filed a petition with the Commission seeking review of the Postal Service's Final Determination to close the Holland, Iowa post office (Holland post office).¹ On November 30, 2011, the Commission issued Order No. 1008, which instituted this proceeding, designated the undersigned Public Representative, and established a procedural schedule.² In accordance with Order No. 1008, the Public Representative submits the following comments that discuss issues relating to the Administrative Record, economic savings, and the effect on postal services.

Administrative Record. The Final Determination states that Postal Service distributed 230 questionnaires, and 70 questionnaires were returned. Final Determination at 2; see Administrative Record, Item No. 23. However, the Administrative Record filed by the Postal Service does not include the returned customer questionnaires and Postal Service response letters. The Postal Service should submit these questionnaires and response letters to ensure that the Commission has a complete copy of the Administrative Record when evaluating the appeal. See 39 U.S.C. § 404(d)(5) (requiring the Commission to review appeals based on the record before the Postal Service).

Economic savings. Petitioner questions the economic savings estimate on grounds that the postmaster has retired, and the OIC currently operating the Holland post office is paid less than the postmaster. The Postal Service responds that the economic savings

¹ Petition for Review of Gary Stoehr, Jr., November 14, 2011. Petitioner's Participant Statement is identical to the Petition. Participant Statement Received from Gary W. Stoehr, Jr., December 27, 2011.

² Notice and Order Accepting Appeal and Establishing Procedural Schedule, November 30, 2011 (Order No. 1008).

calculation conducted as part of a discontinuance study is forward-looking.³ It argues that paying less in salary and benefits over past years does not mean that it can count on those savings annually in the future. *Id.* It contends that if the Holland post office closes, one career slot will be eliminated. *Id.* It asserts that if the Holland post office were not discontinued, the postmaster position would have been filled with a career employee, who would have received the salary and benefits of a postmaster. *Id.*

The Postal Service's position is consistent with the Commission's recent orders affirming final determinations.⁴ Thus, it appears that the Postal Service has satisfied the requirement that it consider economic savings as required by 39 U.S.C. § 404(d)(2)(A)(iv).

The Public Representative notes that the lease for the Holland post office, which terminates in December 2014, does not have a 30-day cancelation clause. See Administrative Record, Item No. 18. Thus, the economic savings should factor in annual lease costs of \$3,600 through December 2014. However, even with these additional costs, the Postal Service would have satisfied the requirements of section 404(d)(2)(A)(iv).

Effect on postal services. After the closure delivery and retail services will be provided by rural route service to cluster box units (CBUs) through the Grundy Center post office. Final Determination at 2. The Grundy Center post office, which has 100 post office boxes available, has an insufficient number of post office boxes to accommodate all 112 post office box customers from the Holland post office. See *id.* However, because the Postal Service is also installing CBUs, Holland customers will continue to receive regular and effective service via delivery to CBUs or post office boxes at the Grundy Center post office.

Conclusion. As noted above, the Postal Service should submit the returned customer questionnaires and Postal Service response letters to ensure that the Commission has a complete copy of the Administrative Record when evaluating the appeal. Otherwise, the Public Representative concludes that no persuasive argument has been presented that

³ United States Postal Service Comments Regarding Appeal, January 9, 2012, at 5.

⁴ See, e.g., Docket No. A2011-100, Order Affirming Determination, January 13, 2012, at 9 (Chairman Goldway and Vice Chairman Langley, dissenting).

would prevent the Commission from affirming the Postal Service's determination to close the Holland post office.

Respectfully submitted,

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